

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST  
LITIGATION

Civil No. 18-1776 (JRT/HB)

This Document Relates to:

ALL CONSUMER INDIRECT  
PURCHASER ACTIONS

**DECLARATION OF DANIEL C.  
HEDLUND IN SUPPORT OF  
PLAINTIFFS' MOTION FOR AN  
AWARD OF ATTORNEYS' FEES  
AND LITIGATION EXPENSES  
SUBMITTED ON BEHALF OF  
GUSTAFSON GLUEK PLLC**

I, Daniel C. Hedlund, hereby declare and state as follows:

1. I am a member of Gustafson Gluek PLLC. I submit this declaration in support of Plaintiffs' Motion for an award of attorneys' fees and expenses in connection with the services rendered, and costs and expenses incurred, in the above-captioned action (the "Action"). I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm and I serve as Plaintiffs' Co-Lead Counsel in this matter with Hagens Berman Sobol Shapiro LLP.

3. Attached hereto as **Exhibit 1** is my firm's total hours and lodestar, computed at current rates, for the period from inception of the case through June 30, 2021. The total number of hours spent by my firm during this time period was 3,942.50 with a corresponding current lodestar of \$1,950,576.00.<sup>1</sup> This summary was prepared

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<sup>1</sup> Such time does not include any time expended in completing this declaration.

from contemporaneous, daily time records regularly prepared and maintained by the firm. The lodestar amount reflected in **Exhibit 1** is for work performed by professional staff at my law firm for the benefit of the Class/Plaintiffs during the aforementioned time period in conjunction with Co-Lead Counsel. In connection with representing Plaintiffs in the Action, my firm did the following, among other things: reviewed and prepared complaint for filing; conferred with proposed class representatives to understand underlying issues in the case; conferred with co-counsel regarding case strategy; attended court conferences; researched and drafted oppositions to motions to dismiss; researched and drafted discovery requests; met and conferred extensively with defendants regarding numerous discovery issues; reviewed, analyzed and coded documents produced by defendants; responded to discovery requests directed to plaintiffs; researched and drafted protective order and ESI protocol; conferred with economic experts; served and negotiated numerous subpoenas with third-party entities; and assisted in various tasks related to the JBS settlement, including issues related to notice and claims administration. The hourly rates for the attorneys and professional staff in my firm reflected in Exhibit A are the usual and customary hourly rates historically charged by my firm in similar complex litigation matters.

4. My firm has expended a total of \$14,174.63 in unreimbursed costs and expenses in connection with the prosecution of the Action from inception of the case through and including June 30, 2021. These costs and expenses are set forth in the chart attached as **Exhibit 2** and reflected on the books and records of my firm. They were incurred on behalf of Plaintiffs by my firm and have not been reimbursed. In addition, my

firm has made substantial contributions to the case litigation fund established by the two Co-Lead Counsel firms.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 6, 2021 in Minneapolis, Minnesota.

*s/Daniel C. Hedlund*  
Daniel C. Hedlund

**EXHIBIT 1****GUSTAFSON GLUEK PLLC****Reported Hours and Lodestar**

Inception through June 30, 2021

<b>Timekeeper</b>	<b>Professional Status</b>	<b>Hours</b>	<b>Current Rate</b>	<b>Total Lodestar</b>
Daniel E. Gustafson	P	76.20	\$1100	\$83,820
Karla M. Gluek	P	.80	\$975	\$780
Jason S. Kilene	P	50.00	\$925	\$46,250
Daniel C. Hedlund	P	246.50	\$925	\$228,013
Amanda M. Williams	P	4.30	\$725	\$3,118
David A. Goodwin	P	30.70	\$675	\$20,723
Michelle J. Looby	P	766.30	\$675	\$517,253
Joshua J. Rissman	P	75.20	\$600	\$45,120
Kathryn M. McDonald	A	5.20	\$540	\$2,808
Brittany N. Resch	A	642	\$500	\$321,000
Kaitlyn L. Dennis	A	.20	\$500	\$100
Mickey L. Stevens	A	123.30	\$450	\$55,485
Ling S. Wang	A	17.00	\$425	\$7,225
Frances Mahoney Mosedale	LC	8.40	\$275	\$2,310
Ellison Snider	LC	1.80	\$200	\$360
Sarah A. Moen	PL	1.50	\$225	\$338
Diana Jakubauskiene	PL	1.00	\$200	\$200
Jamie L. Holzer	PL	4.60	\$200	\$920
Melanie Morgan	PL	260.40	\$175	\$45,570
Chelsea M. Noble	PL	1.50	\$150	\$225
Diana Arnold	CA	412.50	\$350	\$144,375
Deborah Gilman	CA	354.80	\$350	\$124,180
Eric Laidlaw	CA	5.50	\$350	\$1,925
Peter Nguyen	CA	386.00	\$350	\$135,100
Shirley Menard	CA	466.80	\$350	\$163,380
<b>Grand Total</b>		<b>3,942.50</b>		<b>\$1,950,576.00</b>

**Role Legend**

P Partner/Shareholder  
 A Associate  
 LC Law Clerk  
 PL Paralegal  
 CA Contract Attorney

**Exhibit 2****Gustafson Gluek PLLC****Expenses Incurred**

Inception through June 30, 2021

<b>Expense Category</b>	<b>Amount Incurred</b>
Electronic Research (Lexis/Westlaw/PACER)	\$1,466.86
Court Costs – Filing Fees	\$4,900.00
Litigation Fund Contribution	
Express Delivery/Messengers	
Photocopies – In House	\$494.10
Photocopies - Outside	
Postage	\$264.77
Service of Process Fees	\$6,653.25
Telephone / Fax	\$381.65
Transportation / Meals / Lodging	\$14.00
Experts/Consultant Fees	
Court Reporter Service/Hearing Transcript Fees	
<b>TOTAL EXPENSES</b>	<b>\$14,174.63</b>